

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Southern Division)**

CODY SIMPSON, *et al.*,

\*

Plaintiffs,

\*

v.

\* Civil No. 1:17-02532

PURE TECHNOLOGIES U.S., INC.,

\*

Defendant.

\*

\* \* \* \* \*

**JOINT MOTION FOR APPROVAL OF SETTLEMENT**

Plaintiffs, Mr. Nicholas Redding, Mr. Brian Miles, Mr. Austin Clark, Mr. Daniel Castaneda, and Mr. Peter Jaenike, and Defendant, Pure Technologies U.S., Inc. (“Pure Technologies”) (collectively the “Parties”), by and through their undersigned counsel, hereby respectfully request that this Honorable Court approve a settlement agreement that the Parties have reached concerning Plaintiffs’ lawsuit brought pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* (the “FLSA”), the Maryland Wage and Hour Law, Md. Code Ann., Lab. & Empl. §§ 3-401, *et seq.* (the “MWHL”), and the Maryland Wage Payment and Collection Law, Md. Code Ann., Lab. & Empl., §§ 3-501, *et seq.* (the “MWPCL”). Court approval of this settlement is necessary because claims under the FLSA, like those released by Plaintiffs in the attached Settlement Agreement (**Exhibit A**), may not be waived or released without U.S. Department of Labor or Court approval.

Respectfully submitted,

---

/s/ (by permission)

Benjamin L. Davis, III, Esquire  
The Law Offices of Peter Nicholl  
36 South Charles Street  
Suite 1700  
Baltimore, Maryland 21201  
Telephone: (410) 244-7005  
Fax: (410) 244-1047

*Counsel for Plaintiffs*

---

/s/

Kirsten M. Eriksson, Esquire  
Patrick G. Selwood, Esquire  
MILES & STOCKBRIDGE P.C.  
100 Light Street  
Baltimore, Maryland 21202  
Telephone: (410) 727-6464  
Fax: (410) 385-3700

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 3<sup>rd</sup> day of April 2019, a copy of the foregoing **Joint Motion for Approval of Settlement, Memorandum in Support and proposed Order** was sent via the Court's CM/ECF system to:

Benjamin L. Davis, III, Esquire  
The Law Offices of Peter Nicholl  
36 South Charles Street, Suite 1700  
Baltimore, Maryland 21201  
Telephone: (410) 244-7005  
Email: bdavis@nicholllaw.com

*Counsel for Plaintiffs*

---

/s/

Kirsten M. Eriksson, Esquire